

Fill in this information to identify the case:

Debtor 1	<u>Germain W Joyner</u>	
Debtor 2 (Spouse, if filing)		
United States Bankruptcy Court for the: <u>Middle</u>	District of	<u>Pennsylvania</u>
Case number	<u>5:19-bk-04208-MJC</u>	

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of Creditor:	<u>Carrington Mortgage Services, LLC</u>	Court claim no. (if known):	<u>10-3</u>
Last 4 digits of any number you use to identify the debtor's account: <u>XXXXXX0929</u>			
Property address:	<u>3132 Pine Valley Way</u> Number      Street		
	<u>East Stroudsburg, PA 18302</u>	City	State      ZIP Code

#### Part 2: Pre-petition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim. Creditor asserts that the total pre-petition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

#### Part 3: Post-petition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5)  
 of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next post-petition payment from the debtor(s) is due on:

\_\_\_\_\_  
MM/DD/YYYY

Creditor states that the debtor(s) **are not current** on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total post-petition payments due: \_\_\_\_\_  
b. Total fees, charges, expenses, escrow, and costs outstanding \_\_\_\_\_  
Less Suspense \_\_\_\_\_  
c. **Total.** Add lines a and b \_\_\_\_\_

(a) \$ 7,011.51  
+(b) \$ 1,038.00  
(907.12)  
(c) \$ 7,142.39

Creditor asserts that the debtor(s) are contractually  
Obligated for the post-petition payment(s) that first became  
Due on:

Post-petition payments due are from 1/1/2025-3/1/2025  
@\$2,337.17 each.

MM/DD/YYYY

There are fees due in the amount of \$1,038.00 that are  
outstanding, and these fees are listed on the Post-Petition Fee  
Notice filed on 6/2/2023.

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box:*

I am the creditor  
 I am the creditor's authorized agent

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/Charles L. Kennon

Signature

Date 03/14/2025

Print

Charles L. Kennon

First Name Middle Name Last Name

Title Authorized Agent for the Creditor

Company

McCalla Raymer Leibert Pierce, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 325 Chestnut Street, Suite 725

Number Street

Philadelphia, PA 19106

City State Zip Code

Contact phone 725-253-2312

Email Charles.Kennon@mccalla.com

In Re: Germain W Joyner

Bankruptcy Case No.: 5:19-bk-04208-MJC  
Chapter: 13  
Honorable Judge: Mark J Conway

CERTIFICATE OF SERVICE

I, Charles L. Kennon, of McCalla Raymer Leibert Pierce, LLP, 325 Chestnut Street, Suite 725, Philadelphia, PA 19106, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within Response to Notice of Final Cure Payment filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Germain W Joyner  
3132 Pine Valley Way  
East Stroudsburg, PA 18302-6703

Robert J Kidwell, III Esq. *(served via ECF Notification)*  
Newman Williams  
712 Monroe Street  
Stroudsburg, PA 18360

Jack N Zaharopoulos, Trustee *(served via ECF Notification)*  
Standing Chapter 13 (Trustee)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

United States Trustee *(served via ECF Notification)*  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 03/14/2025 By: /s/Charles L. Kennon  
(date) Charles L. Kennon,  
Authorized Agent for the Creditor

Transaction Type	Transaction Date	Amount Received	Post Suspense Short Fall Balance			\$907.12	Escrow	Posting Over/Short	Credit to Post Suspense	Debit from Post Suspense	Post Suspense Balance
			Post-petition Due Date	Post Amt Due Per PCN	Contractual Amt Applied						
Beginning Balance	9/30/2019	\$0.00							\$0.00		\$27.21
Post-Petition	4/29/2022	\$2,430.95	5/1/2022	\$2,430.95	\$2,429.70	\$1,372.82	\$1,058.13	\$0.00	\$0.00	\$0.00	\$27.21
Post-Petition	5/23/2022	\$2,429.70	6/1/2022	\$2,430.95	\$2,430.95	\$1,372.82	\$1,058.13	-\$1.25	\$0.00	\$1.25	\$25.96
Post-Petition	6/6/2022	\$2,582.20	7/1/2022	\$2,430.95	\$2,409.13	\$1,372.82	\$1,058.13	\$151.25	\$151.25	\$0.00	\$177.21
Post-Petition									\$0.00	\$0.00	\$177.21
Post-Petition	1/30/2023	\$19,162.11	8/1/2022	\$2,430.95	\$2,430.95	\$1,372.82	\$1,058.13	\$16,731.16	\$16,731.16	\$0.00	\$16,908.37
Post-Petition			9/1/2022	\$2,430.95	\$2,430.95	\$1,372.82	\$1,058.13	-\$2,430.95	\$0.00	\$2,430.95	\$14,477.42
Post-Petition			10/1/2022	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$12,229.83
Post-Petition			11/1/2022	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$9,982.24
Post-Petition			12/1/2022	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$7,734.65
Post-Petition			1/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$5,487.06
Post-Petition			2/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$3,239.47
Post-Petition			3/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$991.88
Post-Petition	4/13/2023	\$2,250.00	4/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	\$2.41	\$2.41	\$0.00	\$994.29
Post-Petition	7/6/2023	\$4,495.18	5/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$2,247.59	\$0.00	\$3,241.88
Post-Petition			6/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$994.29
Post-Petition	9/21/2023	\$6,742.77	7/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	\$4,495.18	\$4,495.18	\$0.00	\$5,489.47
Post-Petition			8/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$3,241.88
Post-Petition			9/1/2023	\$2,247.59	\$2,247.59	\$1,372.82	\$874.77	-\$2,247.59	\$0.00	\$2,247.59	\$994.29
Post-Petition	10/20/2023	\$2,250.00	10/1/2023	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$5.69	\$5.69	\$0.00	\$999.98
Post-Petition	1/17/2024	\$2,244.31	11/1/2023	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$0.00	\$0.00	\$0.00	\$999.98
Post-Petition	2/9/2024	\$2,244.31	12/1/2023	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$0.00	\$0.00	\$0.00	\$999.98
Post-Petition	4/10/2024	\$4,488.62	1/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$2,244.31	\$2,244.31	\$0.00	\$3,244.29
Post-Petition			2/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	-\$2,244.31	\$0.00	\$2,244.31	\$999.98
Post-Petition	5/30/2024	\$4,488.62	3/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$2,244.31	\$2,244.31	\$0.00	\$3,244.29
Post-Petition			4/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	-\$2,244.31	\$0.00	\$2,244.31	\$999.98
Post-Petition	7/30/2024	\$2,244.31	5/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$0.00	\$0.00	\$0.00	\$999.98
Post-Petition	8/9/2024	\$2,244.31	6/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$0.00	\$0.00	\$0.00	\$999.98
Post-Petition	9/13/2024	\$2,244.31	7/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$0.00	\$0.00	\$0.00	\$999.98
Post-Petition	10/24/2024	\$6,732.93	8/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	\$4,488.62	\$4,488.62	\$0.00	\$5,488.60
Post-Petition			9/1/2024	\$2,244.31	\$2,244.31	\$1,372.82	\$871.49	-\$2,244.31	\$0.00	\$2,244.31	\$3,244.29
Post-Petition			10/1/2024	\$2,337.17	\$2,337.17	\$1,372.82	\$964.35	-\$2,337.17	\$0.00	\$2,337.17	\$907.12
Post-Petition	2/18/2025	\$4,674.34	11/1/2024	\$2,337.17	\$2,337.17	\$1,372.82	\$964.35	\$2,337.17	\$2,337.17	\$0.00	\$3,244.29
Post-Petition			12/1/2024	\$2,337.17	\$2,337.17	\$1,372.82	\$964.35	-\$2,337.17	\$0.00	\$2,337.17	\$907.12